

Exhibit 8

DOCUMENTS AND THINGS REQUESTED

REQUEST FOR PRODUCTION NO. 1

Document(s) or thing(s) sufficient to show the content and operation of Verity K2 software, including for the Verity K2 Toolkit and Verity K2 Catalog, as it existed on or before March 12, 2001. Responsive documents or things include, for example, a copy of Verity K2 source code, including for the Verity K2 Toolkit and Verity K2 Catalog and written descriptions of the same as it existed on or before March 12, 2001. Responsive documents or things further include computer program printouts for Verity K2 software deposited with the United States Copyright Office with the registration number TX0005762136, entitled “Verity developer’s kit v2.7.”

REQUEST FOR PRODUCTION NO. 2

Document(s) or thing(s) sufficient to show the dates of creation of the Verity K2 software, including the Verity K2 Toolkit and Verity K2 Catalog, identified under Request #1. Responsive documents or things may include, for example:

- documents reflecting the earliest date of use of the Verity software, including the Verity K2 Toolkit and Verity K2 Catalog identified under Request #1;

- documents reflecting the earliest publication of the Verity K2 software, including the Verity K2 Toolkit and, Verity K2 Catalog identified under Request #1;
- documents reflecting the earliest description of the Verity K2 software, including the Verity K2 Toolkit and Verity K2 Catalog identified under Request #1; and
- documents indicating the author(s) of or contributor(s) to the Verity K2 software, including the Verity K2 Toolkit and Verity K2 Catalog identified under Request #1;
- documents reflecting when customer(s) were first offered, first purchased or first used the Verity K2 software, including the Verity K2 Toolkit and Verity K2 Catalog identified under Request #1.

REQUEST FOR DEPOSITION

DEPOSITION TOPIC NO. 1

Facts and circumstances relating to the acquisition and hosting by Micro Focus and/or OpenText of the Verity software, including the Verity K2 Toolkit and Verity K2 Catalog, including standard practices for storing, cataloging, and authenticating the same.

DEPOSITION TOPIC NO. 2

The operation of the Verity K2 software, including the Verity K2 Toolkit and Verity K2 Catalog, for which you produced documents and things in response to Requests #1 and #2.

DEPOSITION TOPIC NO. 3

The authenticity and business record status of all documents and things produced in response to Requests #1 and #2.

DEPOSITION TOPIC NO. 4

The search for and collection of documents and things in response to Requests #1 and #2.